

ORIGINAL

1 DARREN S. TESHIMA (STATE BAR NO. 238875)
2 dteshima@orrick.com
3 ROLAND CHANG (STATE BAR NO. 271511)
4 rdchang@orrick.com
5 ORRICK, HERRINGTON & SUTCLIFFE LLP
6 The Orrick Building
7 405 Howard Street
8 San Francisco, California 94105-2669
9 Telephone: 415-773-5700
10 Facsimile: 415-773-5759

78111 11:30:00

11 Attorneys for Plaintiffs
12 BRADEN PARTNERS, LP and
13 TEIJIN PHARMA USA, LLC

14 BRADEN PARTNERS, LP, d/b/a PACIFIC
15 PULMONARY SERVICES, a California
16 limited partnership, and TEIJIN PHARMA
17 USA, LLC, d/b/a PACIFIC PULMONARY
18 SERVICES, a Delaware limited liability
19 company;

20 Plaintiffs,

21 v.

22 TWIN CITY FIRE INSURANCE COMPANY,
23 a Connecticut corporation;

24 Defendant.

MEJ

CV Case No. 14 1689

REDACTED

**BRADEN PARTNERS, LP'S AND
TEIJIN PHARMA USA, LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL RE COMPLAINT FOR
DECLARATORY RELIEF, BREACH
OF CONTRACT, AND BREACH OF
COVENANT OF GOOD FAITH AND
FAIR DEALING**

1 Pursuant to Civil Local Rules 7-11 and 79-5, Plaintiffs Braden Partners, LP, doing
2 business as Pacific Pulmonary Services (“Pacific Pulmonary Services”) and Teijin Pharma USA,
3 LLC (together, “Plaintiffs”), respectfully submit this Administrative Motion for Leave to File
4 Under Seal (the “Administrative Motion”) portions of Plaintiffs’ Complaint for Declaratory
5 Relief, Breach of Contract, and Breach of the Covenant of Good Faith and Fair Dealing (the
6 “Complaint”), the Administrative Motion, filed concurrently with the Complaint, and the
7 Declaration of Darren S. Teshima, filed in support of the Administrative Motion.

8 The Complaint, Administrative Motion, and Teshima Declaration contain confidential
9 information that must be sealed from the public record. Specifically, the Complaint alleges that
10 defendant Twin City Fire Insurance Company (“Twin City”) breached its contractual obligations
11 to Plaintiffs by wrongfully denying coverage and refusing to advance defense costs to Plaintiffs in
12 connection with: [REDACTED]

13
14
15
16
17
18
19
20
21
22
23

24 Federal law requires that the Claim must be sealed from the public record. [REDACTED]

25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15

Because the Complaint, Administrative Motion, and Teshima Declaration discuss the specific content and existence of the Claim, the Court should grant Plaintiffs' Administrative Motion. Pursuant to Civil Local Rule 79-5, Plaintiffs will lodge full copies of the Insurance Complaint, Administrative Motion and Teshima Declaration, and redacted versions of the documents that can be filed into the public record if the Court grants the sealing order.

Dated: April 10, 2014

DARREN S. TESHIMA
ROLAND CHANG
Orrick, Herrington & Sutcliffe LLP

24 By: Dan T *(Rc)*

25 DARREN S. TESHIMA
26 Attorneys for Plaintiffs
27 BRADEN PARTNERS, LP and
28 TEIJIN PHARMA USA, LLC